

110

THE COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss.

RICHARD PEARSON)	DEDHAM SUPERIOR COURT
Plaintiff,)	TRIAL DIVISION
v.)	CIVIL ACTION
GRANITE TELECOMMUNICATIONS)	Docket #
Defendant.)	11 00378

3
RECEIVED & FILED
CLERK OF THE COURTS
NORFOLK COUNTY

COMPLAINT

VERIFIED COMPLAINT AND JURY DEMAND

INTRODUCTION

1. By this civil action, the Plaintiff, Richard Pearson, who shall be referred to from this point on as "Pearson", seeks relief and damages, against Granite Telecommunications.

"Pearson" was employed by Granite Telecommunications from May 1st, 2007 until his termination on March 23rd, 2010. During his employment at Granite Telecommunications "Pearson" was subjected to racial slurs from management as well as offensive sexually explicit emails targeting his homosexuality.

"Pearson" reported any and all instances to the appropriate channels and was terminated on March 23rd, 2010.

PARTIES

2. Plaintiff, Richard Pearson, is an adult resident of the City of Quincy, County of Norfolk, State of Massachusetts.

3. Defendant, Granite Telecommunications, is a company with a principle place of business in the City of Quincy, County of Norfolk, State of Massachusetts.

JURISDICTION AND VENUE

4. Jurisdiction is properly conferred by G.L. c. 212 § 4 and c.223A, § 2 and § 3.
5. Venue is proper under G.L. 223, § 1.

STATEMENT OF FACTS

6. "Pearson" was employed with Granite Telecommunications from May of 2007 until his termination in March of 2010.
7. In 2009 "Pearson's" supervisor used derogatory racial slurs towards him at a meeting. "Just go sit your black ass down".
8. In 2009 "Pearson" overheard two Granite Telecommunication supervisors discussing "Pearson" stating: "One less nigger out today."
9. On March 18, 2010 "Pearson" was called a "dumb black man screwed up again." By his supervisor, Judi O'Day.
10. "Pearson" immediately reported the incident to Lisa Mui, (in-house attorney) and was told, "He misunderstood what they were saying."
11. In 2009 "Pearson" began constantly receiving offensive, crude, and vulgar emails through workplace email system that contained homosexual depictions and homosexual undertones to demean "Pearson's" homosexuality.
12. "Pearson" reported any and all above referenced incidents to the proper chain of command.

STATEMENT OF CLAIMS

COUNT I

VIOLATION OF TITLE VII of the CIVIL RIGHTS ACT of 1964

(Against defendant- Granite Telecommunications)

13. Plaintiff, "Pearson", repeats the allegations contained in Paragraphs 6 through 12 and, by this reference, incorporates them herein.
14. "Pearson" was subjected on numerous occasions to derogatory racial slurs by supervisors at Granite Telecommunications.
15. As a result of "Pearson" reporting these incidents to the proper chain of command he was ultimately terminated.
16. As a result of this violation of Title VII, "Pearson" had suffered and continues to suffer severe emotional injury as well as embarrassment and humiliation within his community and workplace for which defendant is liable.

COUNT II

SEXUAL HARRASSMENT (M.G.L. c.151 (b))

17. Plaintiff, "Pearson", repeats the allegations contained in Paragraphs 6 through 16 and, by this reference, incorporates them herein.
18. "Pearson" was subjected to continuous sexually explicit emails sent through Granite Telecommunications work computers that targeted "Pearson's" homosexuality.
19. As a result of "Pearson" reporting these incidents to the proper chain of command he was ultimately terminated.
20. As a result of this violation of M.G.L. 151 (b), "Pearson" had suffered and continues to suffer severe emotional injury as well as embarrassment and humiliation within his community and workplace for which defendant is liable.

REQUEST FOR RELIEF

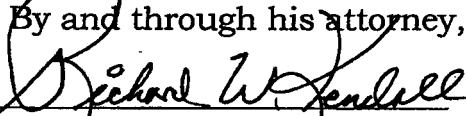
WHEREFORE, Plaintiff requests that this court:

1. Grant Plaintiff relief:
 - a. That the Plaintiff be awarded money damages in an amount which will fairly compensate him for his emotional pain and suffering as well as lost wages and future potential wages;

- b. That the Plaintiff be awarded reasonable attorney's fees and cost;
- c. That the Defendant pay the Plaintiff's interest on any judgment entered in his favor from the date that this civil action was filed; and
- d. Such further relief as this Honorable Court deems just and proper and/or which will make the Plaintiff whole.

JURY DEMAND

Plaintiff demands a jury trial on all issues so triable.

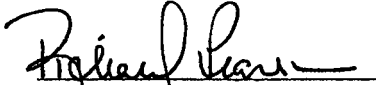
Respectfully submitted
Richard Pearson
By and through his attorney,

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DATED: March 11, 2011

VERIFICATION

I, Richard Pearson, do hereby declare that I have read the foregoing Complaint and know the contents thereof. The same is true to my knowledge except to those matters that are alleged on information and belief; as to those matters, I believe them to be true.

I declare under the pains and penalty's of perjury that the foregoing is true and correct and that this declaration was executed on this 11th day of March, 2011 in Norfolk County, Massachusetts.


Richard Pearson
Plaintiff